

EXHIBIT 18

Excerpts of Oct. 27, 2017 Deposition of Douglas Hollon as Experian's 30(b)(6) witness, Leoni

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAVID LEONI,) Case No. 2:17-cv-01408-RFB-VCF
)
Plaintiff,) Judge Richard F. Boulware, II
V.)
)
EXPERIAN INFORMATION)
SOLUTIONS, INC.,)
And MILITARY STAR,)
)
Defendants.)

* * * * *

CONFIDENTIAL

ORAL DEPOSITION OF EXPERIAN INFORMATION SOLUTIONS,
INC., 30(b)(6) WITNESS DOUGLAS HOLLON

October 27, 2017

* * * * *

ORAL DEPOSITION OF EXPERIAN INFORMATION SOLUTIONS,
INC., 30(b)(6) WITNESS DOUGLAS HOLLON, produced as a
witness and duly sworn, was taken in the above-styled
and numbered cause on October 27, 2017, from 10:02
a.m. until 6:32 p.m., before Suzanne Kelly, CSR No.
1260, in and for the State of Texas, reported by
stenographic method at the Law Offices of
Jones Day located at 2727 N. Harwood Street, Dallas,
Texas, pursuant to Federal Rules of Civil Procedure
and the provisions stated on the record, if any.

JOB NO.: CA2673275

PAGES 1 - 330

1 the CII field that lists the bankruptcy
2 information.

3 So when you look at the ACDV, it's
4 the CII field that determines the bankruptcy
5 information.

6 Q. I see. And on the Subscriber Response,
7 I see that Military Star re-reported the CII of
8 H. Correct?

9 A. Yes, they did.

10 Q. So how did Experian decide whether to
11 favor the CII of H or the account status rating
12 of 97 in Military Star's ACDV response as it was
13 reported on Mr. Leoni's November 24th, 2016,
14 CF -- CDF?

15 A. Okay. We still stored the data. It's
16 still included in bankruptcy. It's still
17 discharged in the bankruptcy. That's what the
18 "CII" means. I believe the question earlier is
19 why the 97, the charge-off was not listed on the
20 CDF.

21 And at that time, I didn't know. I
22 still don't know. So we'll have to clarify that,
23 why it did not appear.

24 Q. Did Experian make a choice as to whether
25 to report the bankruptcy or the charge-off status

1 when it received this -- Military Star's ACDV
2 response?

3 MR. CUMMINGS: Calls for
4 speculation.

5 THE WITNESS: Okay. Well,
6 according to our records, the ACDV was processed
7 through our automated system. So, you know, when
8 you say we made a choice, it was processed
9 through our automation system. So there wasn't a
10 choice. It was just processed.

11 BY MR. CLARK:

12 Q. So, if Experian didn't make a choice,
13 did it blindly rely on the information that the
14 Military Star provided to it in the ACDV
15 response?

16 MR. CUMMINGS: Asked and answered.

17 THE WITNESS: Right data furnishers
18 are the best source for their data. So they
19 provided their answer. They provided their
20 response, and we stored it.

21 BY MR. CLARK:

22 Q. But to be clear, you did not report on
23 Mr. Leoni's CDF an account status of charge-off?

24 A. That is correct, sir. It's not listed
25 on the CDF.

1 Q. So Experian, if nothing else, made a
2 choice about the information it was going to
3 present to Mr. Leoni in the CDF. Correct?

4 A. Right. Again, you're -- you're getting
5 a wrapped-around choice. We don't make a choice
6 of what we're going to report to Mr. Leoni. The
7 CD -- or excuse me -- the ACDVs were processed,
8 and we provided the results to Mr. Leoni.

9 So, it wasn't like we -- a person
10 sat there and said, "Oh, I'm not going to report
11 that. That's not how we do business, sir. I'm
12 sorry."

13 Q. Did Experian make a choice when it
14 denied -- in the manner in which it designed its
15 auto ACDV processing system?

16 A. I'm sorry. That's not an area that I am
17 knowledgeable of. I don't know, you know, what
18 Experian did in regards to designing our database
19 in our systems.

20 Q. Is that something that Pat Finneran
21 might be able to answer for us?

22 MR. CUMMINGS: Objection; calls for
23 speculation.

24 THE WITNESS: I do not know what
25 Pat Finneran could answer to you.

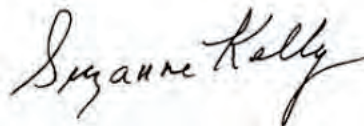
REPORTER'S CERTIFICATION
ORAL DEPOSITION OF
EXPERIAN INFORMATION SOLUTIONS, INC., 30(b)(6)
WITNESS DOUGLAS HOLLON
October 27, 2017

I, Suzanne Kelly, Certified Shorthand Reporter in
and for the State of Texas hereby certify to the
following:

That the witness, EXPERIAN INFORMATION SOLUTIONS,
INC., 30(b)(6) WITNESS DOUGLAS HOLLON, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

I further certify that I am neither counsel for,
related to, nor employed by any of the parties or
attorneys in the action in which this proceeding was
taken, and further that I am not financially or
otherwise interested in the outcome of the action.

In witness whereof, I have this date subscribed my
name on this 10th day of November, 2017.



Suzanne Kelly, CSR, RDR, CRR
Certification No. 1260

JONES DAY

3161 MICHELSON DRIVE • SUITE 800 • IRVINE, CALIFORNIA 92612 4408
TELEPHONE: +1.949.851.3939 • FACSIMILE: +1.949.553.7539

Direct Number: (949) 553-7523
acummings@jonesday.com

JP022961
026123-056719

December 8, 2017

Via UPS

Veritext Legal Solutions
Attn: Production Dept.
707 Wilshire Blvd., Suite 3500
Los Angeles, CA 90017

Re: *David Leoni v Experian Information Solutions, et al.*
USDC, District of Nevada, Case No. 2:17-cv-01408-RFB-VCF

Dear Sir or Madam:

Enclosed please find Douglas Hollon's signature on the Declaration for the transcript of her deposition on October 27, 2017, as Experian Information Solutions, Inc.'s Rule 30(b)(6) designee.

Additionally, Mr. Hollon has requested the following changes to the transcript:

<u>Page:Line</u>	<u>Change</u>	<u>Reason</u>
35:22	Change "Final" to "File."	Typographical error
60:2	Delete "about."	Typographical error
64:17	Change "thirty" to "third."	Typographical error
70:8	Change "profits" to "policies."	Typographical error
83:13	Change "participated" to "parts."	Typographical error
92:13	Change "the inquire I propose" to "the inquiry purpose."	Typographical error

JONES DAY

December 8, 2017

Page 2

<u>Page:Line</u>	<u>Change</u>	<u>Reason</u>
100:2	Change “policies” to “policy is.”	Typographical error
102:16	Change “statement” to “date.”	Typographical error
130:4	Change “initially” to “initial.”	Typographical error
182:1	Change “Maloney” to “Leoni.”	Typographical error
194:19	Change “envelop” to “envelope.”	Typographical error
229:18	Change “experiment” to “Experian.”	Typographical error
231:6	Change “had” to “have.”	Typographical error
280:6	Change “Alls” to “All.”	Typographical error
293:4	Change “Alls” to “All.”	Typographical error

Finally, the following exhibits and testimony should be marked as “Confidential” pursuant to the amended stipulated protective order entered by the Court on February 21, 2017, in the above-referenced action:

Confidential Exhibits

Exhibit 2 (all documents in entirety)

Exhibit 2-A (all documents in entirety)

Exhibit 3 (all documents in entirety)

JONES DAY

December 8, 2017

Page 3

Exhibit 5 (all documents in entirety)

Confidential Testimony (by Page:Line)

95:19-97:9
98:2-99:12
116:12-116:22
124:6-124:19
125:5-125:17
134:24-135:24
136:9-136:25
149:8-149:16
181:3-181:8
182:4-183:22
184:3-184:11
184:22-185:6
191:14-191:23
192:3-192:23
193:12-193:25
194:10-194:24
199:16-199:24
201:6-206:16
207:7-213:1
213:15-216:22
275:6-276:8
277:6-277:19
278:7-278:15
280:18-280:21
295:6-295:15
301:7-301:17

Thank you for your attention to this correspondence. Please contact me with any questions or concerns.

Very truly yours,



Andrew M. Cummings

INSTRUCTIONS FOR READING/CORRECTING YOUR DEPOSITION

To assist you in making corrections to your deposition testimony, please follow the directions below. If additional pages are necessary, please furnish them and attach the pages to the back of the errata sheet.

This is the final version of your deposition transcript.

Please read it carefully. If you find any errors or changes you wish to make, insert the corrections on the errata sheet beside the page and line numbers.

If you are in possession of the original transcript, do NOT make any changes directly on the transcript.

Do NOT change any of the questions.

After completing your review, please sign the last page of the errata sheet, above the designated "Signature" line.

ERRATA SHEET

Page	Line
—	—
—	—
—	—
—	—

Change: See Attached December 8, 2017

Reason: Letter for changes

Change: _____

Reason: _____

Change: _____

Reason: _____

Change: _____

Reason: _____

Page	Line	Change:
_____	_____	_____
		Reason: _____
		Change: _____
_____	_____	Reason: _____
		Change: _____
_____	_____	Reason: _____
		Change: _____
_____	_____	Reason: _____
		Change: _____
_____	_____	Reason: _____
		Change: _____
_____	_____	Reason: _____
		Change: _____

☒ Subject to the above changes, I certify that the transcript is true and correct.

☐ No changes have been made. I certify that the transcript is true and correct.


Signature

12/8/17
Date

EXHIBIT 22

Excerpts of Nov. 6, 2017 Deposition of Plaintiff (“Plaintiff Depo”)

(Redacted)